



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

November 12, 2021

Mr. Jeff Bain  
Product Development Manager  
Pacific Energy Fireplace Products Ltd.  
2975 Allenby Road  
Duncan, British Columbia  
Canada V9L 6V8

Re: Renewal of Certificate of Compliance Number 17-15 for the True North TN 40 Wood Fired Pellet Heater Model

Dear Mr. Bain:

I am pleased to inform Pacific Energy Fireplace Products Ltd. (Pacific Energy) that your March 11, 2021 request for renewal of the above-referenced Certificate of Compliance has been approved pursuant to the 2015 New Source Performance Standard (NSPS) for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces at 40 CFR Part 60, Subpart AAA (2015 NSPS) by the United States Environmental Protection Agency (EPA). Pursuant to the 2015 NSPS, this letter serves as your Certificate of Compliance and is valid through November 16, 2026. Please refer to the above Certificate of Compliance number in all future correspondence.

In accordance with the 2015 Wood Heater Rule at 40 CFR Part 60, §60.533(i)(2), a manufacturer of a heater model line may apply to EPA for renewal of the model line's Certificate of Compliance. To do so, the manufacturer may affirm in writing that the heaters in the model line continue to be similar in all material respects that would affect emissions to the representative heater submitted for testing on which the original Certificate of Compliance was based. In making such an affirmation, the manufacturer also may request a potential waiver from certification testing.

Based on a December 22, 2015 (revised on March 11, 2021) test report by PFS TECO, a December 22, 2015 (revised on March 11, 2021) Certification of Conformity by PFS TECO, and your March 11, 2021, request for renewal of the Certificate of Compliance, EPA has determined that the model line continues to meet the certification requirements at §60.533. Therefore, pursuant to §60.533(i)(2), EPA is waiving certification testing for the above-referenced model. Pacific Energy may not advertise, offer for sale, or sell heaters under this Certificate of Compliance after November 16, 2026, without applying for and being issued another Certificate of Compliance with an updated expiration date.

All pellet heaters manufactured or sold under this Certificate of Compliance must comply with EPA labeling requirements found at §60.536. These provisions require each pellet heater to have a permanent label affixed to it, including the month and year of manufacture, model name or number, serial number, certification test emission value, test method, standard met, and compliance certification statement.

In addition, Pacific Energy must comply with all applicable requirements of the regulation, including:

1. Conducting a third-party certifier-approved quality assurance program which ensures that all units within a model line are similar to the pellet heater submitted for certification testing in all respects that would affect emissions and are in compliance with the applicable emission limit, pursuant to §60.533(m);
2. Applying for recertification or obtaining a recertification waiver from EPA whenever any change is made to the above-referenced model that affects or is presumed to affect the particulate matter emission rate for the model line, pursuant to §60.533(k)(1);
3. Providing an owner's manual that includes the information listed in §60.536(g)(1) with each affected pellet heater model offered for sale;
4. Submitting a report to the EPA every two years following issuance of a Certificate of Compliance for each model line. This report must include the sales for each model by state and certify that no changes in the design or manufacture of this model line have been made that require recertification under §60.533(k);
5. Retaining records and submitting reports as required at §60.537; and
6. Submitting pellet heaters for audit testing if selected by the EPA under §60.533(n)(1)(i) and (2)(i).

Failure to comply with these requirements may result in revoking this Certificate of Compliance and enforcement action, including penalties as specified under the Clean Air Act. If you have any questions concerning this letter, please contact Rafael Sanchez of my staff at (202) 564-7028 or via email at [WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov).

Sincerely,



Anthony J. Miller  
Acting Director  
Monitoring, Assistance, and Media Programs Division  
Office of Compliance  
Office of Enforcement and Compliance Assurance